COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Green Bay Packaging Inc.
Winchester Coated Products Division
Frederick County, Virginia
Permit No. VRO81158

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Green Bay Packaging has applied for renewal of the Title V Operating Permit for its pressure sensitive material manufacturing facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: 5/7/09
Kevin B. Covington
(540) 574-7881

Air Permit Manager: _____ Date:
Sharon G. Foley, P.E.

Deputy Regional Director: _____ Date: 5/8/09
Larry M. Simmons, P.E.

FACILITY INFORMATION

Permittee
Green Bay Packaging Inc.
P. O. Box 19017
Green Bay, WI 54307-9017

Facility
Green Bay Packaging Inc.
Winchester Coated Products Division
P. O. Box 3568
Winchester, VA 22604-2575
Plant ID No. 51-069-0108

SOURCE DESCRIPTION

Facility Description: SIC Code 2672 (Coated and Laminated Paper, NEC) and NAICS 322222 (Coated and Laminated Paper Manufacturing)

Green Bay Packaging Inc. - Winchester Coated Products Division (referred to as Green Bay Packaging or the permittee) manufactures pressure sensitive materials for the Roll Label industry. The material is manufactured in wide web, bulk roll form on a large machine called a tandem coating line. All coatings and laminating are done in one process. This process is broken down into various stages. Liner rolls are mounted on a turret and are coated with a solventless silicone. The silicone is applied to a gravure roll, which is deposited to a rubber roll and in turn is transferred to the liner. Dryer #1 cures the silicone on the liner. After a cooling and moisturizing stage, the liner is coated with a water-based adhesive by one of three methods. These methods are the Gravure, Mayer rod, or a slot die mechanism. Dryer #2 dries the adhesive. Facer rolls are mounted on the turret. A primer coating is applied to the backside of the face stock. The primer coat consists of a light coatweight of a clay slurry applied by either Mayer rod or Gravure methods. Dryer #3 dries the primer coat. The face material then comes in contact with the silicone-coated liner carrying adhesive in the laminating station. The combined product is rewound into larger diameter rolls. Emission sources include the coating operations and the gas-fired dryers.

The facility is a Title V major source of volatile organic compounds (VOC) and total hazardous air pollutants (total HAP or THAP). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility has a minor new source review (NSR) permit issued on January 21, 2004, as amended on February 12, 2009.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on August 19, 2008. In addition, all reports and other data required by permit conditions or regulations, which

are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

CHANGES SINCE RENEWAL OF THE TITLE V PERMIT IN 2004

The existing Title V permit became effective on May 18, 2004, and one permit modification has been issued since then: a minor modification dated February 4, 2008. This minor modification was issued at the permittee's request in order to update the permit's listing of Insignificant Emission Units after the installation of a Miura steam generating boiler. This boiler, which is rated at 1.969 MMTBu/hr, is insignificant due to its size.

CHANGES TO THE EXISTING TITLE V PERMIT

There are two primary revisions to the new permit from the existing permit dated February 4, 2008: (i) removal of authorization to operate a proposed second tandem emulsion coating line (Unit 2) that was never constructed; and (ii) deletion of the facility-wide emission limit for nitrogen oxides (NOx) that was initially added to the operating permit in 1999 at the company's request in order to avoid federal continuing release notification requirements. A summary of all substantive or otherwise noteworthy revisions to the permit follows.

Global Changes:	All references to the facility's minor NSR permit were changed from "01/21/04 Permit" to "01/21/04 Permit, as amended 02/12/09" to reflect the recent amendment of the minor NSR permit. In each section of the permit titled Testing, the table of approved test methods was removed to be consistent with current agency boilerplate.
Section I:	None
Section II:	The proposed second tandem emulsion coating line (Unit 2), which was not constructed, has been removed from the equipment listing.
Section III:	The permit invalidation provisions regarding the modification of Unit 1 previously set forth in Condition III.A.8. were removed because the authorized modifications have been completed. The initial performance test and initial visible emissions evaluation pertaining to the modification of Unit 1 previously set forth in Conditions III.C.1. and III.C.2. were removed because these tests have been completed. The notification provisions regarding the modification of Unit 1 previously set forth in Condition III.E. were removed because these

notifications have been submitted.

Section IV: The entirety of Section IV from the existing permit has been removed from the new permit because the authorization to construct a second tandem emulsion coating line (Unit 2) expired and was removed from the minor NSR permit in its February 12, 2009 amendment. Consequently, the numbering of all subsequent sections has changed from the existing permit.

The nitrogen oxide limit previously set forth in Condition V.A.2. has been removed at the permittee's request. Since this cap was based on the unrestricted potential to emit of NOx from all fuel-burning units at the facility, the deletion of this cap cannot result in an emissions increase. These changes are discussed in detail in the documentation for the February 12, 2009 amendment to the facility's minor NSR permit.

Recordkeeping requirements previously contained in Condition V.B.1. that were associated with the former NOx limit have been removed.

A new Condition IV.D. has been added to address the potential future applicability of the revised Boiler MACT (40 CFR Part 63, Subpart DDDDD).

Section V: The introductory paragraph for Condition V.D. has been revised to require the permittee to comply with one of the four performance test alternatives set forth in Condition V.D. before using a new or reformulated coating material at the facility. In the existing permit, this introductory paragraph required only an initial performance test within 180 days of the December 5, 2005 compliance date.

In Condition V.E.2., language describing the timing of submission of the first compliance report under the permit has been removed because the first compliance report has been submitted.

The notification provisions set forth in Condition VI.F. of the existing permit were removed because they pertained to initial MACT applicability and initial performance testing and are no longer relevant.

Section VI: All changes described above for Section V were also made to the corresponding provisions in Section VI.

Section VII: Emission units 2A/2/B and 2C, which would have been installed to support the second tandem emulsion coating line, were removed.

The reference numbers for the tanks were revised by inserting a "T" before each number. In addition, tanks associated with the second tandem emulsion coating line were removed.

Reference numbers for all emission units listed after the tanks were revised.

Section VIII: None

Section IX: Condition J (Permit Modification) was revised to reflect the current agency boilerplate.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date**
Tandem Coating Line							
1		Egan Machinery Company #920282 (constructed 1992) (NSPS Subpart RR) with a total gas-fired rated capacity of 14.4 mmBTU per hour, consisting of:		---	---	---	02/12/2009
	1A/1B	A- Adhesive Application/Dryer #2	563 gallons/hour				
		B – Primer Application/Dryer #3	187 gallons/hour				
	1C	C- Silicone Application/Dryer #1	19 gallons/hour				

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

**Minor New Source Review permit dated 01/21/04, as amended on February 12, 2009, is for the modification of the existing tandem emulsion coating line (Unit 1). Approval for the installation and operation of a second tandem emulsion coating line (Unit 2) was deleted from the minor NSR permit in the 2009 amendment.

EMISSIONS INVENTORY

A copy of the 2007 emission inventory report is included as Attachment A. Emissions are summarized in the following tables.

2007 Criteria Pollutant Actual Emissions (tpy)

	VOC	CO	SO_2	PM-10	NO_x
Unit 1*	20.36	0.93	0.01	0.82	1.11

* Includes fuel burning.

2007 Hazardous Air Pollutant Actual Emissions (tpy)

Vinyl Acetate	2.77
Acetaldehyde	0.00
Formaldehyde	0.10

EMISSION UNIT APPLICABLE REQUIREMENTS

Tandem Emulsion Coating Line (Unit 1) (Section III)

Limitations

The tandem emulsion coating line (Unit 1) is subject to 40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. All applicable limitations from Subpart RR have been included in the permit. The following limitations are state BACT and other applicable requirements from the state minor NSR permit, as amended on February 12, 2009, and Subpart RR. Please note that the condition numbers are from the 2009 permit; a copy of the minor NSR permit is included as Attachment B.

Condition 6: Limits VOC emissions to 0.20 pounds of VOC per pound of coating solids applied. This limit is to be calculated on a weighted monthly average. (NSPS Subpart RR)

Condition 2: Limits VOC emissions by requiring the use of water based adhesives.

Condition 3: Requires proper handling of VOCs to minimize emissions.

Condition 7: Emission limits in lbs/day and tons/yr for PM and PM-10, and tons/yr for VOC. Annual emissions are to be calculated monthly as the sum of each consecutive 12-month period. These limits apply only to the coating operations.

Condition 8: Visible emission limit of 5% opacity on tandem coating line stacks 1A/1B and 1C.

Since Frederick County is classified as a VOC Control Area under 9 VAC 5-20-206.1.e., the following Virginia Administrative Codes - Emission Standards for Paper and Fabric Coating Application Systems (Rule 4-31) - that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-4330, Standard for volatile organic compounds
9 VAC 5-40-4340, Control Technology Guidelines
9 VAC 5-40-4390, Compliance
9 VAC 5-40-4420, Records

Monitoring

All applicable monitoring requirements from the minor NSR permit and Subpart RR have been included in the permit. The permittee will monitor and record on a daily basis the total amount of coating material used and the weighted average VOC and solids fractions of each coating applied using the coating manufacturer's formulation data as required by the minor NSR permit and NSPS Subpart RR. The permittee will calculate, on a daily basis, the VOC to solids ratio and the total pounds of VOCs, PM, and PM-10 emitted. Equations for calculating the VOC to solids ratio and emissions of VOCs and PM/PM-10 have been included in the permit. Compliance with the VOC weighted monthly average, PM and PM-10 daily and annual limits, and VOC annual limits can all be demonstrated with a mass balance approach. Therefore, the recordkeeping requirements are adequate to satisfy the periodic monitoring requirement for these limits.

Although there is not a VOC limit in the permit for cleaning solvents, there is a requirement for monitoring and recordkeeping of cleaning solvent usage. These requirements were added as part of the minor NSR permit in cooperation with the permittee to track the facility's efforts to minimize the use of cleaning solvents.

The permit requires records to show that each coating as applied meets the 2.9 pounds per gallon limit.

An initial Visible Emission Evaluation (VEE) was required after Unit 1 was modified. Although

visible emissions have not been a concern in the past, the initial VEE confirmed that the modified unit can meet the 5% opacity limit. No additional monitoring for visible emissions has been required. Since this requirement has been fulfilled, it has been removed from the Title V permit.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the VOC content of cleaning solvents; certified Material Safety Data Sheets/VOC Data Sheets or other equivalent documentation; amount of coating material used; weighted average VOC and solids fractions; the VOC to solids ratio; the total pounds of VOC, PM, and PM-10 emitted; and VEE and performance evaluation results.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment; therefore, it is not subject to CAM.

Testing

An initial performance test was required once Unit 1 was modified. The test confirmed that the modified unit can meet the NSPS Subpart RR emission limit. Copies of the tests were sent to DEQ and to EPA. Since this requirement has been fulfilled, it has been removed from the Title V permit. An initial VEE was also required by the Department and indicated compliance.

The permit does not require source emission tests for this unit. The permit states that if testing is performed, the permittee shall use appropriate test methods in accordance with procedures approved by the Department. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit includes quarterly/semi-annual reporting of exceedances of the NSPS Subpart RR VOC emission limit. A schedule of reporting periods and report due dates are included in the permit. Additional information to be included in the report includes monthly and annual throughput and VOC content of cleaning solvents used, weighted average VOC and solids fractions of each coating applied, the VOC to solids ratio, and the total pounds (daily and annual) of VOC, PM, and PM-10 emitted. Copies of the reports are to be sent to DEQ and EPA.

Streamlined Requirements

The 5% opacity limit for the stacks of Unit 1 is more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80, 9 VAC 5-40-4350, and 9 VAC 5-40-4360. Therefore, only the more stringent 5% opacity was included in the permit.

Fuel Burning Equipment (Section IV)

Limitations

The following limitation is state BACT from the minor NSR permit, as amended on February 12, 2009. Please note that the condition number is from the 2009 permit; a copy of the permit is included as Attachment B.

Condition 5: Limits fuels to be used at the facility to natural gas and liquid petroleum gas (propane).

The following Virginia Administrative codes that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-280, Standard for Sulfur Dioxide, Combustion installations.

The following Virginia Administrative Code that has specific emission requirements has been determined to be applicable, but has not been included in the permit because the facility process does not have the potential to emit the regulated pollutant:

9 VAC 5-40-290, Standard for Hydrogen Sulfide

Monitoring and Recordkeeping

The permittee will monitor types of fuel purchased. The permittee will keep records of daily and annual throughput of each type of fuel. Annual fuel throughput recordkeeping is necessary for emissions reporting and fee purposes only.

The fuel burning unit for the tandem coating line is rated at 14.4 mmBtu/hr heat input. Using the standard for sulfur dioxide formula in the permit (S=2.64K where S = the allowable emission of the sulfur dioxide in pounds per hour and K = the actual heat input at total capacity expressed in mmBtu/hr), the allowable sulfur dioxide emissions equals 38.02 lb/hr. Based on EPA AP-42 emission factors, the maximum sulfur dioxide emissions from the unit are as follows:

Fuel Type	Capacity of Fuel Burning Equipment	Maximum Hourly Throughput	AP-42 Emission Factor for Sulfur Dioxide	Maximum Sulfur Content (S)	Maximum lb/hr Emissions of Sulfur Dioxide	Sulfur Dioxide Emission Standard
Natural Gas	14.4 mmBtu/hr	0.0144 mmcf/hr	0.6 lb/mmcf	negligible	0.0086 lb/hr	38.02 lb/hr
Propane	14.4 mmBtu/hr	0.1585 mgal/hr	0.1S lb/mgal	15 gr/100cf	0.24 lb/hr	38.02 lb/hr

As shown in the table above, the maximum hourly emission of sulfur dioxide is only a small fraction of the allowable amount. As long as natural gas or propane is combusted in the dryers, the hourly sulfur dioxide standard cannot be exceeded. Therefore, limitations on fuel type combined with the monitoring of type of fuel purchased provides a reasonable assurance that the sulfur dioxide emission limitation is being met and thus satisfies the periodic monitoring requirement.

The permit includes requirements for maintaining records of all monitoring. These records include the DEQ-approved, pollutant-specific emission factors, fuel throughput, and fuel purchase records.

Testing

The permit does not require source emission tests for this unit. The permit states that if testing is performed, the permittee shall use appropriate test methods in accordance with procedures approved by the Department. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

There are no reporting requirements for the fuel burning equipment.

Facility Wide Requirements for Hazardous Air Pollutants (Sections V and VI)

Applicability

The facility is subject to the 40 CFR 63 Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating* (POWC MACT). The requirements became effective on December 5, 2005 and were included in the facility's previous Title V permit. The permit contains two options for utilizing compliant coatings. Section V contains the permittee's preferred compliance option and Section VI contains the alternative compliance option. The permittee has elected not to pursue add-on controls as a compliance option.

The permittee is required to maintain a log to record which compliance option is in effect at any given time. Log entries are to be made contemporaneous with the change and must include the date the change was made and the compliance option in effect.

Limitations

All applicable limitations from the POWC MACT have been included in the permit. Being subject to the POWC MACT means that the permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Any applicable limitations from the general provisions have also been

included in the permit.

Monitoring

The POWC MACT contains requirements for continuous compliance, including monthly recordkeeping. The POWC MACT contains adequate monitoring to meet the periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment and is therefore not subject to CAM.

Recordkeeping

The POWC MACT contains various requirements for recordkeeping, including organic HAP content, volatile matter, and coating solids content data; as well as organic HAP usage, volatile matter usage, and coating solids usage.

The permittee is required to maintain a log for tracking which compliance option is in effect at any given time. The log entry must be made contemporaneously with the change including the date of the change and the compliance option in effect.

Testing

Performance test requirements for "as-purchased" organic HAP mass fraction, for "as-applied" organic HAP mass fraction, for "as-purchased" volatile organic and coating solids content, and for "as-applied" volatile organic and coating solids content have been included in the permit in accordance with 40 CFR 63.3360.

The permit states that if additional testing is performed, the permittee shall use appropriate test methods in accordance with procedures approved by the Department. The Department and EPA have the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The POWC MACT contains requirements for the submission of a semi-annual compliance report of exceedances of applicable emission limitations. These requirements have been included in the permit and will be submitted concurrently with the reporting requirements contained in 9 VAC 5-80-110.

Streamlined Requirements

The initial applicability notification requirement has already been completed for the POWC MACT; therefore, this notification has not been included in the permit. Also, because the facility has chosen to meet the POWC MACT through coating formulations, no references to add-on control equipment have been included in the permit.

GENERAL CONDITIONS (Section IX)

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

FUTURE APPLICABLE REQUIREMENTS

Emission units 3A, 3R, and 3T (as identified in Section VII. Insignificant Emission Units) will be subject to 40 CFR Part 63, Subpart DDDDD (Industrial/Commercial/ Institutional Boilers and Process Heater NESHAP (Boiler MACT)) when promulgated, unless the permittee obtains federally enforceable limits on its facility-wide emissions of hazardous air pollutants (HAPs) to below major-source thresholds prior to the first substantive compliance date of the Boiler MACT.

INAPPLICABLE REQUIREMENTS (Section VIII)

Inapplicable requirements identified by the applicant include 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. The applicant has stated that this regulation is not applicable for any of the storage tanks (Units T4 through T18) because each tank is below the applicability capacity of less than 75 m^3 (19,812.9 gallons).

INSIGNIFICANT EMISSION UNITS (Section VII)

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act, as they may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
1A/1B, 1C	Cleaning/Maintenance Activities	9 VAC 5-80-720 B	VOC, HAPs	
3A	Humidification Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,650,000 BTU/hr
3B	Hot Water Heaters & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	250,000 BTU/hr
3C, 3D	Office Heating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3E – 3J	Space Unit Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,200,000 BTU/hr
3K – 3O	Dock Door Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3P	Maintenance Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60,000 BTU/hr
3Q	Tank Room Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	75,000 BTU/hr
3R	Cleaver-Brooks Steam Generating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,045,000 BTU/hr
3S	Plant Area Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60, 000 BTU/hr
T4-T9 & T16-T18	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	8,325 Gallons
T10-T15	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	2,650 Gallons
19	Safety Kleen Parts Washer or Equivalent (solvent or aqueous based)	9 VAC 5-80-720 B	VOC, HAPs	30 Gallon Unit

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
20	Slitters / Rewinders / Trim Conveying / Coaters Web Cleaning Dust Collection Units / Silicone Mist Vacuum Units / Core Cutters	9 VAC 5-80-720 B	VOC, PM/PM-10	-
21	Lime Make-up Tanks for the Batch Wastewater Pretreatment System	9 VAC 5-80-720 B	PM/PM-10	-
22	Diatomaceous Earth (or equivalent) Make-up Tanks for the Batch Wastewater Pretreatment System	9 VAC 5-80-720 B	PM/PM-10	-
23	Wastewater Pretreatment System Chemicals (e.g. polymers, alum, ferrous sulfate, ferric chloride)	9 VAC 5-80-720 B	VOC, HAPs, PM/PM-10	-
24	Shrink Wrap Heat Guns / System	9 VAC 5-80-720 B	VOC	-

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee submitted a request for confidentiality for the following portions of their Title V application: VOCs and HAPs in the inks, coatings, stains, and adhesive materials, as well as for calculations associated with these materials. The permittee maintains that public release of this information would provide competitors with information that could be used to calculate specific production capabilities, capacities, processes, and/or procedures, which could cause substantial harm to the company's competitiveness. The permittee considers this information to be proprietary and confidential within Green Bay Packaging Inc., and has undertaken measures to protect from disclosure to the general public, its customers, and its own employees. DEQ granted this request for confidential status in a letter to the permittee dated March 5, 2009.

PUBLIC PARTICIPATION

A public notice appeared in the Winchester Star on March 5, 2009 announcing a 30-day public comment period for this permit. The public comment period opened on March 6, 2009 and ended on April 6, 2009, and EPA's comment period ended on April 20, 2009 (concurrent review of the permit as both draft and proposed). No comments were received from either the public or EPA.

Attachment A

2007 Emissions Inventory Report

Registration Number: 81158

County - Plant ID: 069-00108

Plant Name: Green Bay Packaging Inc

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Pollutant Type: All Pollutants

Parameter List

Years: 2007-2007

	ACETA	CO	FORM	MTMRY	NH3	NO2	PM	PM 10
2007	0.000	0.928	0.100	0.000	0.547	1.105	0.824	0.824

Registration Number: 81158

County - Plant ID: 069-00108

Plant Name: Green Bay Packaging Inc

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Pollutant Type: All Pollutants

Parameter List

Years: 2007-2007

	PM 2.5	SO2	VA	VOC
2007	1.270	0.007	2.770	20.361

Attachment B

Minor New Source Review Permit

Issued 1/21/04; Amended 2/12/09

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE
4411 Early Road, P.O. Box 3000, Harrisonburg, Virginia 22801
(540) 574-7800 Fax (540) 574-7878
www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Amy Thatcher Owens
Regional Director

February 13, 2009

Mr. Paul J. Hasemeyer
Senior Vice President
Green Bay Packaging Inc.
P.O. Box 3568
Winchester, Virginia 22604-2575

Facility: Winchester Coated Products Division
Location: Frederick County
Registration No.: 81158
Plant ID No.: 51-069-0108

Dear Mr. Hasemeyer:

Attached is a minor amendment to your minor new source review permit dated January 21, 2004 to modify and operate a pressure sensitive material manufacturing facility in accordance with the provisions of the Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

The Department of Environmental Quality (DEQ) deemed the application complete on January 13, 2009 and has determined that the application meets the requirements of 9 VAC 5-80-1280.A for a minor amendment to a new source review permit.

This permit approval to modify and operate shall not relieve Green Bay Packaging Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by

filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Kevin Covington of the Valley Regional Office at (540) 574-7881.

Sincerely,

Larry M. Simmons, P.E.
Deputy Regional Director

Attachments: Permit
Source Testing Report Format
NSPS, Subpart RR

c: Director, DEQ OAPP (electronic file submission)
Manager, DEQ Data Analysis (electronic file submission)
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE
4411 Early Road, P.O. Box 3000, Harrisonburg, Virginia 22801
(540) 574-7800 Fax (540) 574-7878
www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Amy Thatcher Owens
Regional Director

STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

This permit includes designated equipment subject to New Source Performance Standards (NSPS).

This permit supersedes your permit dated August 1, 2000.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Green Bay Packaging Inc.
Winchester Coated Products Division
P.O. Box 3568
Winchester, Virginia 22604-2575
Registration No.: 81158
Plant ID No.: 51-069-0108

is authorized to modify and operate

a pressure sensitive material manufacturing facility

located at

285 Park Center Drive
Fort Collier Industrial Park
Frederick County, Virginia

in accordance with the Conditions of this permit.

Approved on January 21, 2004.

Amended on February 12, 2009

Deputy Regional Director, Valley Region

Permit consists of 8 pages.
Permit Conditions 1 to 23.

INTRODUCTION

This permit approval is based on the permit applications dated January 7, 2009 and February 20, 2003, including amendment pages dated July 10, 2003 and supplemental information dated April 11, 2003, May 13, 2003, June 30, 2003, August 12, 2003, September 5, 2003, and October 29, 2003. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses ( ) after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment to be modified and operated at this facility consists of:

   - one tandem emulsion coating line, Egan Machinery Co. 920282. The line contains ovens with a total gas-fired rated capacity of 14.4 million Btu per hour. (NSPS) (Ref. 1);

   Previously permitted equipment at this facility prior to the date of this permit consists of:

   - 15 aboveground, internal storage tanks for coatings and coating components;

   - associated slitters/rewinders; and

   - miscellaneous gas-fired equipment with a total rated capacity of less than 10 million Btu per hour.

   Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
   (9 VAC 5-80-1180 D 3)

2. **Emission Controls** – Volatile organic compound emissions from the tandem emulsion coating line (Ref. 1) shall be controlled by the use of water based adhesives.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

3. **Pollution Prevention** - Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
(9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-50-20)

4. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the NSPS equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart RR.
(9 VAC 5-80-1180, 9 VAC 5-50-400, and 9 VAC 5-50-410)

OPERATING AND EMISSION LIMITATIONS

5. **Fuels** - The approved fuels for process equipment at the facility are natural gas and liquefied petroleum gas (propane). A change in the fuels may require a permit to modify and operate.
(9 VAC 5-80-1180)

6. **Emission Limits** – Volatile organic compound (VOC) emissions from the operation of the tandem emulsion coating line (Ref. 1), as calculated on a weighted monthly average, shall not exceed 0.20 pound of VOC per pound of coating solids applied.
(9 VAC 5-80-1180, 9 VAC 5-50-260, 9 VAC 5-50-410, and 40 CFR 60.442 (a)(1))

7. **Emission Limits** - Emissions from the operation of the tandem emulsion coating line (Ref. 1) shall not exceed the limits specified below:

Particulate Matter (coating operations)	123.0 lbs/day	21.8 tons/yr
PM-10 (coating operations)	123.0 lbs/day	21.8 tons/yr
Volatile Organic Compounds (coating operations)		92.4 tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

8. **Visible Emission Limit** - Visible emissions from the tandem emulsion coating line stack shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-1180, 9 VAC 5-50-80, and 9 VAC 5-50-260)

RECORDS AND REPORTS

9. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

   a. Monthly and annual throughput and VOC content of cleaning solvents used (in pounds), calculated monthly as the sum of each consecutive 12-month period.

   b. Certified Material Safety Data Sheets (MSDS)/VOC Data Sheets showing VOC content, water content, and solids content for each coating used in Ref. 1.

   c. Daily throughput (in pounds), weighted average VOC and solids fractions, and the VOC to solids ratio of each coating used in the tandem emulsion coating line (Ref. 1).

   d. Daily and annual emissions (in pounds) of VOC, PM, and PM-10 from the tandem emulsion coating line (Ref. 1). Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

   e. The daily and annual throughput of natural gas (in cubic feet) and the daily and annual throughput of liquefied petroleum gas (propane) (in gallons) for all fuel burning equipment.

   f. Results of all visible emission evaluations and performance evaluations.

   g. Fuel purchase records including type of fuel purchased.

   These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
   (9 VAC 5-80-1180 and 9 VAC 5-50-50)

10. **Quarterly Reports** – Following the initial report as required in Condition 12, the permittee shall submit a quarterly report to the Director, Valley Regional Office, of exceedances of the VOC emission limit specified in Condition 6 for the tandem emulsion coating line (Ref. 1). If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Director, Valley Regional Office, semi-annually. One copy of the quarterly/semi-annual report shall be submitted to the U.S. Environmental Protection Agency (EPA) at the address specified below:

    Associate Director
    Office of Air Enforcement (3AP10)
    U.S. Environmental Protection Agency
    Region III
    1650 Arch Street
    Philadelphia, PA 19103-2029

After the initial report, subsequent reports shall be submitted in accordance with the schedule contained in Condition 11.

(9 VAC 5-80-1180, 9 VAC 5-50-50, and 9 VAC 5-50-410)

11. **Quarterly Reports** – The permittee shall submit a report to the Director, Valley Regional Office, in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 – March 31	June 1
April 1 – June 30	September 1 *
July 1 – September 30	December 1
October 1 – December 31	March 1 *

*semi-annual report dates

Each quarterly report shall contain, at a minimum, the dates included in the calendar quarter and a summary of the information requested in parts a, c, and d of Condition 9.
(9 VAC 5-80-1180 and 9 VAC 5-50-50)

INITIAL COMPLIANCE DETERMINATION

12. **Performance Test** – An initial performance test shall be conducted by calculating a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period for the tandem emulsion coating line (Ref. 1) to determine compliance with the emission limit contained in Condition 6 according to the following procedures:

    a. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

    b. Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

    G = the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied each calendar month.

    M_{ci} = the total mass (lb) of each coating (i) applied during the calendar month as determined from facility records.

    W_{oi} = the weight fraction of VOC applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

The test shall be performed, reported, demonstrate compliance, and the results submitted to the Director, Valley Regional Office (postmarked) within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after modification to tandem emulsion coating line (Ref. 1). The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Valley Regional Office. One copy of the performance test result shall be submitted to EPA at the address contained in Condition 10. The test report shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30, 9 VAC 5-80-1180, and 9 VAC 5-50-410)

13. **Visible Emissions Evaluation** - Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted by the permittee on the following equipment: tandem emulsion coating line stack exhausts 1A and 1B. Each test shall consist of ten sets of 24 consecutive observations (at 15 second intervals) to yield a six-minute average. The details of the tests are to be arranged with the Director, Valley Regional Office. The evaluation shall be performed, reported, and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after modification to tandem emulsion coating line (Ref. 1). One copy of the test result shall be submitted to the Director, Valley Regional Office, within 60 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30 and 9 VAC 5-80-1180)

CONTINUING COMPLIANCE DETERMINATION

14. **Continuing Compliance** - The permittee shall determine compliance with the VOC limit in Condition 6 each calendar month by calculating the weighted average of the mass of solvent used per mass of coating solids applied using the procedure described in Condition 12 for Ref. 1.
(9 VAC 5-50-410)

15. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested at the appropriate locations in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).
(9 VAC 5-50-30 F)

GENERAL CONDITIONS

16. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

a. Knowingly makes material misstatements in the permit application or any amendments to it;

b. Fails to comply with the conditions of this permit;

c. Fails to comply with any emission standards applicable to a permitted emissions unit;

d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or

e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.

(9 VAC 5-80-1210 F)

17. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-1180)

18. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the tandem emulsion coating line (Ref. No. 1):

a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

b. Maintain an inventory of spare parts.

c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)

19. **Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9 VAC 5-20-180 J and 9 VAC 5-80-1180 D)

20. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Valley Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Valley Regional Office.
(9 VAC 5-20-180 C and 9 VAC 5-80-1180)

21. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)

22. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Valley Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-1240)

23. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-1180)

SOURCE TESTING REPORT FORMAT

Cover
1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Tester; name, address and report date

Certification
1. Signed by team leader / certified observer (include certification date)
* 2. Signed by reviewer

Introduction
1. Test purpose
2. Test location, type of process
3. Test dates
* 4. Pollutants tested
5. Test methods used
6. Observers' names (industry and agency)
7. Any other important background information

Summary of Results
1. Pollutant emission results / visible emissions summary
2. Input during test vs. rated capacity
3. Allowable emissions
* 4. Description of collected samples, to include audits when applicable
5. Discussion of errors, both real and apparent

Source Operation
1. Description of process and control devices
2. Process and control equipment flow diagram
3. Process and control equipment data

* Sampling and Analysis Procedures
1. Sampling port location and dimensioned cross section
2. Sampling point description
3. Sampling train description
4. Brief description of sampling procedures with discussion of deviations from standard methods
5. Brief description of analytical procedures with discussion of deviation from standard methods

Appendix
* 1. Process data and emission results example calculations
2. Raw field data
* 3. Laboratory reports
4. Raw production data
* 5. Calibration procedures and results
6. Project participants and titles
7. Related correspondence
8. Standard procedures

* Not applicable to visible emission evaluations.